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13 Attorneys for Defendants, COUNTY OF SAN BERNARDINO
14 and BREANA FITE

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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 DEBORAH MOLLER, an individual
20 and successor –in-interest of
21 BRET BREUNIG, deceased,

22 Plaintiffs,

23 vs.

24 COUNTY OF SAN BERNARDINO,
25 a public entity; BREANA FITE

26 Defendant.

MASTER CASE NO. 5:22-CV-01306-
DSF-MAR

Assigned for All Purposes to:
Hon. Dale S. Fischer– Courtroom 7D

**STIPULATION REQUESTING
PRETRIAL CONFERENCE BE
RESCHEDULED DUE TO
SCHEDULING CONFLICT
[PROPOSED] ORDER**

Pretrial Conference: July 29, 2024
Trial Date: August 13, 2024

TO THE HONORABLE COURT:

Defendants County of San Bernardino and Breana Fite (“County Defendants”) by and through their undersigned counsel and Plaintiff Deborah Moller individually and as successor in interest (Plaintiff) by and through her undersigned counsel, hereby stipulate and request that the Court reschedule the pretrial conference set for July 29, 2024 as to the trial against the County Defendants, due to a scheduling conflict with lead trial counsel for County Defendants. Good cause exists for this request as follows:

1. On February 9, 2024, this Court issued its order granting separate trials as to Plaintiff’s claims against County Defendants and Loma Linda Defendants. (Dkt 203).

2. On May 2, 2024, this Court ordered the parties to meet and confer and submit a joint statement proposing new trial dates for this matter. (Dkt. 209).

3. In compliance with this order, the parties filed their Joint Statement on May 13, 2024, advising this Court that the parties were available for trial as to the case against the County Defendants on either August 13, 2024 or October 15, 2024 and that the Loma Linda Defendants were available for trial as to the case against them on October 29, 2024. (Dkt. 210).

4. In accordance with this joint statement, the Court has now ordered that the trial against the County Defendants will proceed on August 13, 2024 at 8:30 a.m. and the case against the Loma Linda Defendants will proceed on October 29, 2024 at 8:30 a.m. (Dkt. 211).

5. The Court also set a Pre Trial Conference as to the County Defendants for July 29, 2024 at 1:30 p.m. (Dkt. 211).

6. While lead trial counsel for the County Defendants, Ms. Gustafson, remains available for trial set for August 13, 2024 as set forth in the Joint Statement, Ms. Gustafson has a scheduling conflict on July 29, 2024, the date of the Pretrial

1 Conference.

2 7. Specifically, Ms. Gustafson has advised Plaintiff's counsel that she is
3 scheduled to attend a family wedding in Long Island, New York on the evening of
4 Sunday, July 28, 2024 and will therefore be traveling back from the east coast on July
5 29, 2024, the date set for the Pretrial Conference.

6 8. As such, Ms. Gustafson has requested and Plaintiff's counsel have
7 stipulated to advance the Pretrial Conference to July 22, 2024 to accommodate these
8 travel plans so that Ms. Gustafson may attend her cousin's wedding in New York.
9 Alternatively, if advancement of the Pretrial Conference is not available for the Court,
10 the parties stipulate to reschedule the conference to another date that same week
11 between July 30, 2024 to August 2, 2024.

12 **IT IS SO STIPULATED.**

13
14 DATED: May 21, 2024

CONLOGUE LAW, LLP

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17 By: /s/ Ashley Conlogue

ASHLEY M. CONLOGUE

Attorney for Plaintiff DEBORAH
MOLLER

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19
20 DATED: May 21, 2024

LYNBERG & WATKINS, APC

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22
23 By: /s/ Shannon L. Gustafson

SHANNON GUSTAFSON

AMY MARGOLIES

Attorney for Defendants SAN
BERNARDINO COUNTY, BREANA
FITE

1 I certify that all parties to this document have consented to its filing and to the
2 language contained herein and have authorized the undersigned to affix their
3 electronic signatures.

4 DATED: May 21, 2024

LYNBERG & WATKINS, APC

7 By: /s/ Shannon L. Gustafson

8 **SHANNON GUSTAFSON**

9 **AMY MARGOLIES**

10 Attorney for Defendants SAN

11 BERNARDINO COUNTY, BREANA

12 FITE